

**REMARKS**

Claims 1-53 are all the claims pending in the application, new claim 53 having been added as indicated herein.

Claims 25, 26, 41, and 42 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 1-24, 27-40, and 43-52 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Borella et al. (U.S. Patent No.: 6,731,642).<sup>1</sup>

The applied reference, Borella, is directed to a system for routing a call between a caller station and a callee station, accessible via an intermediate network. *See column 2, lines 2-5 of Borella.* Applicant submits, however, that Borella does not satisfy the limitations of the claimed invention, as set forth below.

With respect to independent claim 1, Applicant submits that Borella does not teach or suggest at least, “converting IP and port information in a header and payload of a received or transmitted packet according to an assigned ID and port number,” as recited in claim 1. The Examiner cites column 4, lines 52-67 as allegedly satisfying the above-quoted limitation, however nowhere does Borella teach or suggest converting IP and port information in a header and payload of a received or transmitted packet, and nowhere does Borella teach or suggest that such a converting operation is performed according to an assigned ID and port number.

Furthermore, at column 4, lines 66-67, Borella specifically states that port addresses need not be

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<sup>1</sup> Actually, on page 2 of the Office Action, the Examiner alleges that claims 1-52 are rejected over Borella, however this is incorrect since, on page 6 of the Office Action, the Examiner indicates that claims 25, 26, 41, and 42 contain allowable subject matter

translated, therefore it is evident that conversion of port information is not taught or suggested by Borella. Therefore, at least based on the foregoing, Applicant submits that independent claim 1 is patentably distinguishable over Borella.

Applicant submits that dependent claims 2-5 are patentable at least by virtue of their dependency from independent claim 1.

With respect to independent claim 6, Applicant submits that Borella does not teach or suggest at least, “assigning a port to a first terminal when said first terminal requests a call initiation,” as recited in claim 6. That is, nowhere does Borella even mention assigning a port to a terminal, and certainly does not discuss assigning such port to a first terminal when the first terminal request a call initiation. The portion of Borella cited by the Examiner only mentions that some transport protocols allow the addition of a sixteen-bit port address, however, there is no mention of a port being assigned and there is no mention of a port being assigned when said first terminal requests a call initiation. Therefore, at least based on the foregoing, Applicant submits that independent claim 6 is patentably distinguishable over Borella.

Applicant submits that dependent claims 7-27 are patentable at least by virtue of their respective indirect or direct dependency from independent claim 6.

Further, with respect to dependent claims 7 and 30, Applicant submits that nowhere does Borella teach or suggest that IP and port information of a terminal is stored in the header and payload of a packet, and that such IP and port information are changed in the packet conversion.

Further, with respect to dependent claims 11-15, the Examiner cites Figure 3 of Borella as allegedly satisfying the limitations of claims 11-15. However, upon review of Borella (including Fig. 3), Borella does not satisfy several of the features set forth in claims 11-15 and

31. For example, with respect to claim 11 (from which claims 12-15 depend), Borella does not teach or suggest requesting a call initiation by said first terminal when the registration is completed. Borella (Fig. 3) does not even show a registration being completed. Further, with respect to claim 13, nowhere does Borella teach or suggest transmitting the IP and port number of said second terminal to said first terminal when the call connection is admitted. Therefore, at least based on the foregoing, Applicant submits that dependent claims 11-15 are patentably distinguishable over Borella.

With respect to independent claim 29, the Examiner rejects this claim for the reasons set forth on page 6 of the Office Action. Applicant does not quite understand the Examiner's assertion in numbered paragraph 18 on page 6 of the Office Action. Nevertheless, as similarly argued above with respect to independent claim 1, Applicant submits that Borella does not teach or suggest at least, "opening a channel for said second terminal according to the IP and port information of a destination in the packet upon request of the call connection" and "converting transmitted and received packets according to the IP and port information of a first terminal and second terminal," as recited in claim 29.

Applicant submits that dependent claims 30-43 are patentable at least by virtue of their respective direct and indirect dependency from independent claim 29.

Further, with respect to dependent claims 27 and 43, the Examiner indicates that these claims are rejected on the Office Action Summary page, however the Examiner does not address these particular claims in the body of the Office Action. In any event, Applicant submits that Borella does not teach or suggest at least that "the port information is registered in a gate keeper

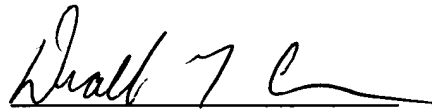
and updated by the gate keeper when the port information is changed," as recited in claims 27 and 43.

Finally, Applicant adds new claim 53, as indicated herein, to provide a varying scope of coverage. Applicant submits that this new claim is patentable at least by virtue of its dependency from independent claim 6.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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